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Via Electronic Filing

Hon. Katharine H. Parker, U.S.M.J.
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Cano v. SEIU Local 32BJ, et al.*
Docket No.: 1:19-cv-08810 PAE-KHP

Dear Judge Parker:

This firm represents Defendants Solil Management, LLC and Sol Goldman Investments, LLC (“Defendants”) in the above-captioned matter. We write pursuant to Local Rule 37.2 and Your Honor’s Individual Practice II(c) for discovery disputes.

Defendants served a Request for Interrogatories and a Request for Production of Documents on Plaintiff on November 29, 2021 and then upon Plaintiff’s counsel who entered an appearance that day. We subsequently sent a follow-up request to Plaintiff’s counsel, who then requested an extension of time to January 12, 2022 to respond. Thereafter, by letter dated January

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13, 2022, we advised Plaintiff's counsel that Plaintiff's discovery responses are overdue. Having not received a response, the undersigned reached out by phone and left a message on January 28, 2022. To date, we have not received any response to our letter or phone call and have therefore been unable to meet-and-confer with Plaintiff's counsel about Plaintiff's outstanding discovery.

As Your Honor may be aware, the parties currently have a Case Management Conference scheduled for February 10, 2022. Accordingly, Defendants write in advance of the conference to respectfully request that the Court address the aforementioned discovery dispute by way of "informal conference" pursuant to Individual Practice II(c) at that time, or allow Defendants to file the appropriate motion.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/Ashley V. Whitney
Ashley V. Whitney, Esq.

AVW/cs

cc: John F. Lagan, Esq.

The upcoming conference on February 10, 2022 is a case management conference where the Court will discuss the outstanding discovery with the parties' prior to motion practice.

SO ORDERED:

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

2/2/2022